

**Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

**TITLE V
AIR QUALITY PERMIT**

Permittee Name: Sherwin-Williams Automotive Finishes Corporation
Mailing Address: 395 Boggs Lane South
Richmond, Kentucky 40475

Source Name: Sherwin-Williams Automotive Finishes Corporation
Source Location: Same as above

Permit Type: Federally Enforceable
Review Type: Title V

Permit Number: V-00-006
Log Number: F913
**Application
Complete Date:** February 12, 1999

KYEIS ID #: 102-2520-0020
AFS Plant ID #: 21-151-00020
SIC Code: 2851

Region: Frankfort
County: Madison

Issuance Date: February xx, 2000
Expiration Date: February xx, 2005

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SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application, which was determined to be complete on February 12, 1999, the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant.

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in the Regulation 401 KAR 50:035, Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Heat Exchangers

- 01 (PE) Cleaver Brooks Boiler**
CB100-300
Construction date: 1975
Operated in warmer weather.
Rated capacity: 12.553 mmBTU/hr
Power output: 300 hp
Primary fuel: Natural gas
Maximum annual fuel usage rate: 110 mmcf
- 02 (PH) Cleaver Brooks Boiler**
CB 773-700
Construction date: 1980
Operated in cooler weather.
Rated capacity: 23.4 mmBTU/hr
Power output: 700 hp
Primary fuel: Natural gas
Secondary fuel: Propane
Maximum annual fuel usage rate: 205 mmcf

APPLICABLE REGULATIONS:

401 KAR 59:015, *New Indirect Heat Exchangers* constructed on or after April 9, 1972.

Operating Limitations: NA

Emission Limitations:

According to 401 KAR 59:015, Sections 4 and 5:

Emissions of particulate matter shall not exceed 0.531 lb/mmBTU and 0.4584 lb/mmBTU, based on a three-hour average, from boilers 01 and 02, respectively.

Emissions of sulfur dioxide shall not exceed 2.733 lb/mmBTU and 2.116 lb/mmBTU, based on a three-hour average, from boilers 01 and 02, respectively.

The opacity of visible emissions shall not exceed 20%; however, a maximum of 40% shall be permissible for not more than six (6) consecutive minutes in any sixty (60) consecutive minutes during cleaning the fire box or blowing soot.

Compliance Demonstration Method:

The permittee shall certify annually that only natural gas or propane (as a secondary fuel) was fired in each boiler.

During periods when the boiler is fired with natural gas or propane, the permittee is deemed to be in compliance.

SECTION B (CONTINUED)

Testing Requirements:

Emission testing protocol, test data, and results determining PM₁₀ and sulfur dioxide emissions identified in the application shall be maintained on site for the life of the source. These tests shall be evaluated every five years for applicability and accuracy or any time a new type of product involving compounds not detailed in this application for these emission points is manufactured/processed. A written report of this evaluation shall be provided to the division upon request. If a change in applicability or an inaccuracy is found in these methods of emission determination, the division shall be notified in writing and testing shall be repeated as deemed necessary by the division to reflect current and future production capabilities.

The permittee shall perform emission testing within 60 days of receipt of a written request from the division. The testing shall be performed in accordance with the applicable methods referenced in 401 KAR 59:015, Section 8.

Specific Monitoring Requirements:

The permittee shall monitor and maintain records of the following information:

The monthly (calendar month) fuel usage rate (cubic feet per month or gallons per month) of the natural gas or propane.

The monthly hours of operation of each boiler.

The sulfur content of the fuel burned. If the fuel supplier certification is used to demonstrate compliance with the sulfur content limits, the records shall contain the following information:

The name of the fuel supplier.

A statement from the supplier certifying the sulfur content of the fuel.

Specific Recordkeeping Requirements:

The permittee shall maintain records of the items listed in 4 above and make them available to division personnel upon request.

Specific Reporting Requirements:

See General Condition F.5.

Specific Control Equipment Operating Conditions: NA

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**03 Paint Manufacturing Plant**

PF, PG, PH2	Dry Base Weigh & Mix Fugitive/ Low Level <u>Description</u> Scales Capacity: 4500 lb/hr Construction date: 1978 Control equipment: Dust Collector PH/PI, 97% control efficiency Construction date: 1978
PJ	Wash Tank <u>Description</u> Solvent wash tank Capacity: 200 lb/hr Construction date: 1978
PN	Base Agitation <u>Description</u> Scales, mixer Capacity: 5000 lb/hr Construction date: 1978
PO	Small Batch #1 Fugitive/Low level/Particulate <u>Description</u> Mixer 1, COM #18 -20 gallon Mixer 2 Mixer 3, COM # 16 -120gallon, COM #20 - 20 liter Ross Mixer, COM #19 Capacity: 4500 lb/hr Construction date: 1975 Control equipment: Dust collector PO-1 for small batch area only Anticipated construction date: 2000
PP	Small Batch #2 Fugitive/low level <u>Description</u> Kady Mixer 25 T Mixer 4, EHP 20L - #22 Capacity: 1000 lb/hr Construction date: 1998
PM	Portable Tank Cleaner Fugitive/Low level <u>Description</u> Low level ventilation and generic tank cleaning equipment

Capacity: 562 lb/hr
Construction date: 1994

SECTION B (CONTINUED)

PL	Solvent Cleaning Tank Fugitive <u>Description</u> Spray nozzle enclosure Capacity: 1520 lb/hr Construction date: 1975
PK	Wash Tank <u>Description</u> 30-gallon wash tank Capacity: 500 lb/hr Construction date: 1975
E01	Jacketed Ball Mill Fugitive/Low Level <u>Description</u> 4-1650 gallon mills 2-455 gallon mills 2-59 gallon mills Construction Date: 1975 4-1269 gallon mills 1-1030 gallon mill 1-206 gallon mills Construction date: 1994 Capacity: 8538 lb/hr
E02	Pail Washer Fugitive/Low Level <u>Description</u> 2-30 gallon units Capacity: 500 lb/hr Construction date: 1976
E02, E03	Portable Mixing Tanks Fugitives <u>Description</u> 65-500 gallon 8-250 gallon 37-100 gallon 45-400 gallon Drop station #5 Capacity: 15,000 lb/hr Construction date: 1995
V100	Dust Collector

Description

Control equipment for all of Manufacturing (PMV00-PMV90)
Dust collector V100, 97% control efficiency

SECTION B (CONTINUED)

PMV00

Low-Speed Mixers

Description

LSM 1, COM #21 – 20 liter
LSM 2 60-gallon
LSM 5 16-gallon
Capacity: 15,000 lb/hr
Construction date: 1994
Control equipment: Dust collector V100

Thin & Shade Tanks

Description

Tanks #1, 3, 4, 5-2500 gallons
Tank #2-3000 gallons
Drop station #1

PMV10

Low-Speed Mixers

Description

LSM #3 300 gallons
LSM #4 100 gallons
Control equipment: Dust collector V100

Thin & Shade Tanks

Description

Tanks #10, 14-1000 gallons
Tanks #12, 16-4000 gallons
Tanks #11, 15-2000 gallons
Drop station #2

Capacity: 15,000 lb/hr
Construction date: 1975

PMV20

Paint Mixing & Dispersion

Description

HSD #1-1100 gallons, 30 gallon COM
HSD #2-1100 gallons, 60 gallon COM
Tank #20-8000 gallons
Tank #21-2000 gallons
Tank #22-1000 gallons
Tanks #23, 24-4000 gallons
Drop station #3
Capacity: 15,000 lb/hr
Construction date: 1975

Control equipment: Dust collector V100

SECTION B (CONTINUED)

PMV30

Paint Mixing & Dispersion

Description

HSD #3-1100 gallons, 60 gallon COM

HSD #4-500 gallons

Tank #31, #34, #35-5000 gallons

Tank #33-3000 gallons

Drop station #4

Construction date: 1975

HSD #4B-1400 gallons, 200 liter COM

Tank #30, 2000 gal

Construction date: 1992

Capacity: 15,000 lb/hr

Control equipment: Dust collector V100

PMV40

Paint Mixing & Dispersion

Description

HSD #5, 300 gallons, 16 gallon COM

HSD #6, 300 gallons, 16 gallon COM

Tanks #'s 40-49/1000 gallons

Drop station #6

Capacity: 15,000 lb/hr

Construction date: 1975

Control equipment: Dust collector V100

PMV40A

Paint Mixing & Dispersion

Description

HSD #5A 1100 gallons

45 liter COM

Capacity: 2400 lbs/hr

Anticipated construction date: 2000

Control equipment: Dust collector V100

PMV50

Paint Mixing & Dispersion

Description

HSD #7-300 gallons,

HSD #8-500 gallons,

COM #7-16 gallons

COM #8-16 gallons

Tanks #'s 50, 51, 52, 54, 55, 56-2000 gallons

Tanks # 53, 57-1000 gallons
Capacity: 15,000 lb/hr
Construction date: 1975
Control equipment: Dust collector V100

SECTION B (CONTINUED)

PMV60 Paint Mixing & Dispersion
Description
HSD #9, 10-1100 gallons
COM #9 50 L
Tanks #'s 60-65 - 4000 gallons each
Drop station #8
Capacity: 15,000 lb/hr
Construction date: 1975
Control equipment: Dust collector V100

PMV70 Paint Mixing & Dispersion
Description
HSD #11, 12-500 gallons, 2-59L COM
Tanks #'s 70-77 - 2000 gallons
Drop station #9
Capacity: 15,000 lb/hr
Construction date: 1975
Control equipment: Dust collector V100

PMV80 Paint Mixing & Dispersion
Description
HSD #'s 13, 14-800 gallons
HSD #15-800 gal
COM #13-30 gal
COM #14- 16 gal
Tanks #'s 80-85 - 3000 gallons
Drop station #10
Capacity: 15,000 lb/hr
Construction date: 1975
Control equipment: Dust collector V100

PMV90 Paint Mixing & Dispersion
Description
HSD #16-250 gallons
Drop station #11
Capacity: 5000 lb/hr
Construction date: 1992
Control equipment: Dust collector V100

PMV90A Blend Tanks

Description

Tank #90-8000 gallons
Tank #91-2000 gallons
Capacity: 867 gal/hr
Construction date: 1992

SECTION B (CONTINUED)

- PMV110 Mixing & Finishing**
Description
IPV #'s 32, 38, 39, 46, 47, 53-4000 gallons
Capacity: 15,000 lb/hr
Construction date: 1975
- PMV120 Mixing & Finishing**
Description
IPV 600-1000 gallons
IPV 601-1000 gallons
IPV 602-1000 gallons
IPV 603-1000 gallons
IPV 605-1000 gallons
Capacity: 15,000 lb/hr
Construction date: 1975
- PMV120A Mixing & Finishing**
Description
Tank 604-2000 gallons
Capacity: 18,261 lb/hr
Construction date: 1994
- PMV130 Paint Mixing & Dispersion**
Description
IPV 606-2000 gallons
IPV 607-2000 gallons
IPV 608-2000 gallons
IPV 609-2000 gallons
IPV 610-2000 gallons
IPV 611-2000 gallons
Capacity: 15,000 lb/hr
Construction date: 1994
- PMV140 Paint Mixing & Finishing**
Description
IPV 12, 13, 14, 26, 27, 28-2000 gallons
Construction date: 1975
Capacity: 15,000 lb/hr

PMV150 Paint Mixing & Finishing
Description
IPV 613-620/2000 gallons
Capacity: 15,000 lb/hr
Construction date: 1975

SECTION B (CONTINUED)

PMV160 Paint Mixing & Finishing
Description
IPV 621-624/1000 gallons
Capacity: 15,000 lb/hr
Construction date: 1975

PMV170 Paint Mixing & Finishing
Description
IPV 6, 23-6000 gallons
IPV 10, 19-4000 gallons
Capacity: 15,000 lb/hr
Construction date: 1975

PMV180 Paint Mixing & Finishing
Description
IPV 33, 52-4000 gallons
IPV 37, 48-6000 gallons
Thinner tanks 1, 2, 3, 4-8000 gallons
Capacity: 15,000 lb/hr
Construction date: 1975

E01 Pigmented Paint Filling
Description
Filling machine A-B
Filling machine C
Filling machine D
Low-level ventilation
Capacity: 3600 gph
Construction date: 1975

E04 Pigmented Paint Filling
Description
Filling machines E, F, G
Date Constructed: 1976
Filling machine G1/2
Construction date: 1992
Capacity: 3600 gph

E05A Paint Filling Point Source**Description**

Pigmented paint filling machines A-B, C, D, E, F, G
Solvent wash tank
6 feed pumps
6 surge tubs
Capacity: 9000 gph
Construction date: 1995

SECTION B (CONTINUED)**E05B Paint Filling Point Source****Description**

Pigmented paint filling machines G1/2, H, H1/2
4 feed pumps
4 surge tubs
Capacity: 900 gph
Construction date: 1992

E06 Clear Product Filling**Description**

MRM filler
1 filling pump
1 surge tub
Capacity: 18,261 lb/hr
Construction date: 1994

E06 Five-Gallon Fill Line**Description**

5-gallon filling line
1 filling pump
1 surge tank
Capacity: 18,900 lb/hr
Construction date: 1976

E06 Drum Filling**Description**

Drum filling
1 filling pump
Capacity: 4000 lb/hr
Construction date: 1992

E07 White House #1**Description**

Clear Filling
Serac filler
1 filling pump
1 surge tank

Capacity: 4000 gph
Construction date: 1990

SECTION B (CONTINUED)

E08	White House #2
	<u>Description</u>
	Clear Filling
	Corniani filling machine
	1 feed pump
	1 surge tank
	Capacity: 750 gal/hr
	Construction date: 1997

APPLICABLE REGULATIONS:

401 KAR 59:010, *New Process Operations*, applies to particulate matter emissions from the paint manufacturing plant, emission point 03.

Operating Limitations: NA

Emission Limitations:

Pursuant to 401 KAR 59:010, opacity of visible emissions from these emission points shall not equal or exceed 20%.

Pursuant to 401 KAR 59:010, total emissions of particulate matter from these emission points shall not exceed 39.90 lb/hr.

Compliance Demonstration Method:

During periods of normal operation of the dust collector, the permittee is deemed to be in compliance. If the paint manufacturing plant is in operation during any period of malfunction of the dust collector, the permittee shall determine compliance using the following formula:

Emission Rate = Processing Rate x Emission Factor

Testing Requirements:

The permittee shall perform particulate emission testing within 60 days of receipt of a written request from the division. The testing shall be performed in accordance with the applicable methods referenced in 401 KAR 50:015.

Specific Monitoring Requirements:

The permittee shall maintain, calibrate, and operate, according to manufacturer specifications, a monitoring device for the measurement of the differential static pressure across the dust collectors. A daily log of the pressure drop shall be maintained.

Specific Record Keeping Requirements:

Actual production shall be determined on a monthly basis. These records shall be maintained on site for a period of five years from the date the data was collected and shall be provided to the division upon request.

Specific Reporting Requirements: NA

SECTION B (CONTINUED)

Specific Control Equipment Operating Conditions:

The pressure drop gauges on the dust collectors shall be inspected daily to ensure proper operation of the control devices. The pressure drop across the control devices shall be maintained in accordance with manufacturer specifications.

Alternate Operating Scenarios: NA

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

04 SOLVENT RECOVERY OPERATION

V41 Solvent Settling Tank

Description:

17,000-gallon dirty solvent settling tank

1000 gal transfer tank

Construction date: 1975

Control equipment: Protecto Seal

Waste Solvent Storage Tank

Description:

7400 gallon waste solvent (isowash) storage tank

Construction date: 1985

Control equipment: Protecto Seal

V50 Solvent Recovery Operation

Description:

Distillation equipment

Capacity: 700 gallons per hour output

Construction date: 1975

Control equipment: 1. Low-level ventilation, 100% capture efficiency
 2. Solvent condenser unit, 95% control efficiency

APPLICABLE REGULATIONS: NA

Operating Limitations: NA

Emission Limitations: NA

Testing Requirements: NA

Specific Monitoring Requirements: NA

Specific Recordkeeping Requirements: NA

Specific Reporting Requirements: NA

Specific Control Equipment Operating Conditions: NA

Alternate Operating Scenarios: NA

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**05 Resin Manufacturing****R01-01 Low-Temperature Reactor****Description:**

8000-gallon tank, steam-heated

Maximum rated capacity: 4500 lb/hr

Construction date: 1985

Control equipment: Condenser E-1-1
 Yula WC 1K 120CS, 99% control efficiency
 Area: 550 square feet

R02-01 Low-Temperature Reactor**Description:**

6000-gallon tank, steam-heated

Maximum rated capacity: 4000 lb/hr

Construction date: 1985

Control equipment: Condenser E-2-1
 Yula WC 1H 120CS, 99% control efficiency
 Area: 400 square feet

R03-01 High-Temperature Reactor**Description:**

5000-gallon tank, Therminol system provides heat

Maximum rated capacity: 3500 lb/hr

Construction date: 1985

Control equipment: Venturi Scrubber, fabricated for resin plant, prevents
release of particulates during loading of dry raw materials.

Control equipment: Condenser E-3-1
 Yula WC 1F 120BS, 99% control efficiency
 Area: 1000 square feet

J14-2 Vacuum Pump-QA Sample**Description:**

R3 Sample port vacuum pump

Construction date: 1985

R04-01 High-Temperature Reactor**Description:**

1000-gallon tank

Maximum rated capacity: 4500 lb/hr

Anticipated construction date: 1999/2000

SECTION B (CONTINUED)**R05-01 RESIN EXPANSION PROJECT: REACTORS & ANCILLARY**

Anticipated construction: 2000-2001

R06-01 EQUIPMENT INVENTORY

Anticipated construction: 2000-2001

R07-01 RESIN PLANT EXPANSION**Description:**

3-5000 gallon reactor vessels

12 base tanks, 12,000 gallons each

4 hold tanks, 20,000 gallons each

2 thin tanks, 7500 gallons each

1 dispersion tank, 1500 gallons

5 weigh tanks w/load cells (1500 gal, 2500 gal, 1800 gal, 500 gal, 500 gal)

2 fractionation columns, 20 ft. long

2 fractionation columns, 10 ft. long

2 condensers, 1500 sq.ft.

2 condensers, 750 sq.ft.

4 water collection tanks, 250 gallons each

1 filter press, 5 cu.ft.

Maximum rated capacity: 4500 lb/hr

Anticipated construction date: 2000-2001

(W-2-2) R2 Monomer Weigh Tank**Description:**

3500-gallon tank

Maximum rated capacity: 4000 lb/hr

Construction date: 1985

(W-3-2) R3 Oil Weigh Tank**Description:**

3500-gallon tank

Maximum rated capacity: 3500 lb/hr

Construction date: 1985

(W-1-2) R1 Monomer Weigh Tank**Description:**

5500-gallon tank

Maximum rated capacity: 4500 lb/hr

Construction date: 1985

(W-3-3) R3 Phthalic Anhydride Weigh Tank**Description:**

1500-gallon tank
Maximum rated capacity: 3500 lb/hr
Construction date: 1985

SECTION B (CONTINUED)

(W-3-12) R3 Water-Off Weigh Tank

Description:

300-gallon tank
Maximum rated capacity: 3500 lb/hr
Construction date: 1985

(T-1-4) R1 Thin Tank

Description:

10,000-gallon tank
Maximum rated capacity: 4500 lb
Construction date: 1985
Control equipment: Condenser E-1-4
Yula WC 1F 120BS, 99% control efficiency
Area: 250 square feet

(T-2-4) R2 Thin Tank

Description:

10,000 gallon tank
Maximum rated capacity: 4000 lb
Construction date: 1985
Control equipment: Condenser E-2-4
Yula WC 1F 120BS, 99% control efficiency
Area: 250 square feet

(T-3-4) R3 Thin Tank

Description:

12,000-gallon tank
Maximum rated capacity: 3500 lb
Construction date: 1985
Control equipment: Condenser E-2-5
Yula WC 1J 120CS, 99% control efficiency
Area: 250 square feet

(T-2-5) R2 Thin Tank

Description:

10,000-gallon tank
Maximum rated capacity: 4000 lb
Construction date: 1985
Control equipment: Condenser E-2-4
Yula WC 1F 120BS, 99% control efficiency
Area: 250 square feet

SECTION B (CONTINUED)

- (T-1-8) **R1 Holding Tank**
 Description:
 10,000-gallon tank
 Maximum rated capacity: 4500 lb
 Construction date: 1985
- (T-2-8) **R2 Holding Tank**
 Description:
 10,000-gallon tank
 Maximum rated capacity: 4000 lb
 Construction date: 1985
- (T-2-9) **R2 Holding Tank**
 Description:
 10,000-gallon tank
 Maximum rated capacity: 4000 lb
 Construction date: 1985
- (T-3-8) **R3 Holding Tank**
 Description:
 12,000-gallon tank
 Maximum rated capacity: 3500 lb
 Construction date: 1985
- (F-1-6) **R1 Filter Press**
 Description:
 2x2 Plate frame
 Maximum rated capacity: 4500 lb
 Construction date: 1985
- (F-2-6) **R2 Filter Press**
 Description:
 2x2 Plate frame
 Maximum rated capacity: 4000 lb
 Construction date: 1985
- (F-3-6) **R3 Filter Press**
 Description:
 3x3 Plate frame
 Maximum rated capacity: 3500 lb
 Construction date: 1985

SECTION B (CONTINUED)

- (F-3-7) **R3 Filter Press**
Description:
3x3 Plate frame
Maximum rated capacity: 3500 lb
Construction date: 1985
- (V-1-1) **R1 Decanter**
Description:
200-gallon tank
Construction date: 1985
- (V-2-1) **R2 Decanter**
Description:
200-gallon tank
Construction date: 1985
- (V-3-1) **R3 Decanter**
Description:
600-gallon tank
Construction date: 1985
- (V-3-1) **Wastewater Holding Tank**
Description:
2-3,000 gallon tanks
Construction date: 1985
- (T-1-6) **R2 Filter Aid Mix Tank**
Description:
250-gallon tank
Maximum rated capacity: 4500 lb
Construction date: 1985
- (T-2-5) **R2 Filter Aid Mix Tank**
Description:
200-gallon tank
Maximum rated capacity: 4000 lb
Construction date: 1985
- (T-3-6) **R3 Filter Aid Mix Tank**
Description :

350-gallon tank
Maximum rated capacity: 3500 lb
Construction date: 1985

SECTION B (CONTINUED)

(T-9-1) Methacrylic Acid Mix Tank

Description:

3,000-gallon tank
Construction date: 1985

(T-14-1) Vapor Relief Surge Tank

Description:

Product: Solvent condensate
12,000-gallon tank
Construction date: 1985
Control equipment: Condenser E-14-1
Yula WC 1E 120BS, 99% control efficiency
Area: 133 square feet

(T-16-1) Filter Press Clean Tank

Description:

1,000-gallon tank
Construction date: 1985

(T-16-2) Solvent Return Tank

Description:

1,000-gallon tank
Construction date: 1985

(T-16-3) Solvent Return Tank

Description:

1,000-gallon tank
Construction date: 1985

(T-11-2) Hot Oil System Surge Tank

Description:

1,000-gallon tank
Construction date: 1985

APPLICABLE REGULATIONS: 401 KAR 59:010, *New Process Operations*, applies to particulate matter emissions from emission point 05 (R03-01).

Operating Limitations:

The condensers shall be operated properly in accordance with manufacturer specifications and/or standard operating procedures at all times that the reactors, thinning tanks, and surge tank are in operation.

The venturi scrubber shall be operated properly in accordance with manufacturer specifications and/or standard operating procedures during the loading of dry raw materials into reactor R03.

SECTION B (CONTINUED)

Emission Limitations:

Pursuant to 401 KAR 59:010, emissions of particulate matter from emission point 05 (R03-01) shall not exceed 5.08 lb/hr each.

Pursuant to 401 KAR 59:010, opacity of visible emissions from emission point 05 (R03-01) shall not equal or exceed 20%.

Compliance Demonstration Method:

During periods of normal operation of the venturi scrubber, reactor vessel R03 is deemed to be in compliance. If the reactor is in operation during any period of malfunction of the venturi scrubber, the permittee shall determine compliance using the following formula:

Emission Rate = Processing Rate x Emission Factor

Testing Requirements:

The permittee shall perform particulate emission testing within 60 days of receipt of a written request from the division. The testing shall be performed in accordance with the applicable methods referenced in 401 KAR 59:015, Section 8.

Specific Monitoring Requirements:

The permittee shall maintain, operate, and calibrate the interlocks so that the venturi scrubber will not operate without adequate flow.

Specific Record Keeping Requirements:

Actual production shall be determined on a monthly basis. Monthly records shall be maintained on site for a period of five years from the date the data was collected and shall be provided to the division upon request.

The permittee shall maintain a log of routine and non-routine maintenance and calibration of the interlocks.

The permittee shall record the occurrence, duration, cause, and any corrective action taken for each incident when dry raw material additions are being made to reactor R03 and the venturi scrubber was not in operation.

The permittee shall record the occurrence, duration, cause, and any corrective action taken for each incident when one or more of the condensers was not in operation but the affected facility was.

Specific Reporting Requirements: NA

Specific Control Equipment Operating Conditions:

The interlocks on the venturi scrubber shall be calibrated quarterly to ensure interruption in the

operation of the scrubber without adequate waterflow.

The permittee shall maintain, calibrate, and operate according to manufacturer specifications the reactor, reducing tank, and surge tank condensers. The reactors, reducing tanks, and surge tank shall only be operated when the corresponding condensers are operating properly.

Alternate Operating Scenarios: NA

SECTION B (CONTINUED)

9. Compliance Schedule: Emission point 05 (R03-01)

The permittee must certify, within 90 days of the issuance of this permit, that the venturi scrubber is equipped with interlocks to prevent the operation of the venturi scrubber without adequate waterflow.

Compliance with the terms and conditions of this Section shall be certified annually on the permit anniversary date, to the Division for Air Quality and to the U. S. EPA when compliance has been achieved. The compliance certification shall include the following:

The identification of the permit term or condition in this Section that is the basis of the certification;

The compliance status;

Whether compliance is continuous or intermittent; and,

The method used for determining the compliance status, currently and over the reporting period pursuant to Regulation 50:035, Section 7(1)(c), (d), and (e).

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to Regulation 401 KAR 50:035, Section 5(4). While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

	<u>Description</u>	<u>Generally Applicable Regulation</u>
1.	20, 21, 21A, 21B-Quality Control and Technical Labs Dry filter spray booths 600 lb/yr VOCs including HAPs	KAR 61:020
2.	PR-Ovens 0 lb/hr VOC	None
	PW, PV-Wash tanks 1 lb/hr VOC	None
	PT-Ovens 0 lb/hr VOC	None
5.	PZ-Portable dry filter booth 600 lb/yr VOC including HAPs	KAR 61:020
	51-Indirect heat exchanger Therminol VA Power Liquid Phase Heater	KAR 59:015
7.	Interior storage tanks: 50A, 50B, 50C 51A, 51B 52A, 52B 53-63 64A, 64B 65-77 14-2 The emission from each tank is 0 lb/hr under normal conditions.	None
8.	D1 DSC Paint Blending, Repour, Can Crushing	None
9.	06 Bulk Liquid Storage Tanks T1—T34	None
10.	05 Indirect Heat Exchanger for Resin Plant Expansion Description: Hot Oil Heater Anticipate construction: 2000/2001	KAR 59:015

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

In no way does this permit relieve the permittee from the responsibility for controlling odorous emissions in accordance with the ambient air odor standard in administrative regulation 401 KAR 53:010.

Under no circumstances shall the permittee cause an exceedance of the ambient levels listed in Regulation 401 KAR 55:005. The Director shall have the authority to require the permittee to take whatever measures are deemed necessary to comply with this condition.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:

Date, place as defined in this permit, and time of sampling or measurements.

Analyses performance dates;

Company or entity that performed analyses;

Analytical techniques or methods used;

Analyses results; and

Operating conditions during time of sampling or measurement.

Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [401 KAR 50:035, Permits, Section 7(1)(d)2 and 401 KAR 50:035, Permits, Section 7(2)(c)]

In accordance with the requirements of Regulation 401 KAR 50:035, Permits, Section 7(2)(c) the permittee shall allow the Cabinet or authorized representatives to perform the following:

Enter upon the premises where a source is located or emissions-related activity is conducted, or where records are kept;

Have access to and copy, at reasonable times, any records required by the permit:

During normal office hours, and

During periods of emergency when prompt access to records is essential to proper assessment by the Cabinet;

Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times shall include, but are not limited to the following:

During all hours of operation at the source,

For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and

During an emergency; and

Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times shall include, but are not limited to the following:

During all hours of operation at the source,

For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and

During an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

SECTION F (CONTINUED)

5. Reports of any monitoring required by this permit shall be reported to the division's Frankfort Regional Office no later than the six-month anniversary date of this permit and every six months thereafter during the life of this permit, unless otherwise stated in this permit. The permittee may shift to semi-annual reporting on a calendar year basis upon approval of the regional office. If calendar year reporting is approved, the semi-annual reports are due January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to Section 6(1) of Regulation 401 KAR 50:035, Permits. All deviations from permit requirements shall be clearly identified in the reports.
6.
 - a. In accordance with the provisions of Regulation 401 KAR 50:055, Section 1 the owner or operator shall notify the Division for Air Quality's Frankfort Regional Office concerning startups, shutdowns, or malfunctions as follows:
When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.
 - b. In accordance with the provisions of Regulation 401 KAR 50:035, Section 7(1)(e)2, the owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by general condition 6 a. above) to the Division for Air Quality's Frankfort Regional Office within 30 days. Other deviations from permit requirements shall be included in the semiannual report required by general condition F.5.
7. Pursuant to Regulation 401 KAR 50:035, Permits, Section 7(2)(b), the permittee shall certify compliance with the terms and conditions contained in this permit, annually on the permit issuance anniversary date or by January 30th of each year if calendar year reporting is approved by the regional office, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Division for Air Quality's Frankfort Regional Office and the U.S. EPA in accordance with the following requirements:
 - a. Identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status regarding each term or condition of the permit;
 - c. Whether compliance was continuous or intermittent; and
 - d. The method used for determining the compliance status for the source, currently and over the reporting period, pursuant to 401 KAR 50:035, Section 7(1)(c), (d), and (e).
 - e. The certification shall be postmarked by the thirtieth (30) day following the applicable permit issuance anniversary date or by January 30th of each year if calendar year reporting is approved by the regional office. **Annual compliance certifications should be mailed to the following addresses:**

SECTION F (CONTINUED)

**Division for Air Quality
Frankfort Regional Office
643 Teton Trail, Suite B
Frankfort, KY 40601**

**U.S. EPA Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960**

**Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601**

8. In accordance with Regulation 401 KAR 50:035, Section 23, the permittee shall provide the division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission report is mailed to the permittee.
9. Pursuant to Section VII.3 of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the division by the source or its representative within forty-five days after the completion of the fieldwork.

SECTION G - GENERAL CONDITIONS

(a) General Compliance Requirements

The permittee shall comply with all conditions of this permit. A noncompliance shall be (a) violation(s) of state regulation 401 KAR 50:035, Permits, Section 7(3)(d) and is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.

The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition.

This permit may be revised, revoked, reopened and reissued, or terminated for cause. The permit will be reopened for cause and revised accordingly under the following circumstances:

If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to Regulation 401 KAR 50:035, Section 12(2)(c);

The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;

The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the division may provide a shorter time period in the case of an emergency.

The permittee shall furnish to the division, in writing, information that the division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. [401 KAR 50:035, Permits, Section 7(2)(b)3e and 401 KAR 50:035, Permits, Section 7(3)(j)]

The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority.

SECTION G (CONTINUED)

Any condition or portion of this permit that becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [401 KAR 50:035, Permits, Section 7(3)(k)]

The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance. [401 KAR 50:035, Permits, Section 7(3)(e)]

Except as identified as state-origin requirements in this permit, all terms and conditions contained herein shall be enforceable by the United States Environmental Protection Agency and citizens of the United States.

This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6). [401 KAR 50:035, Permits, Section 7(3)(h)]

Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 50:035, Permits, Section 8(3)(b)]

This permit shall not convey property rights or exclusive privileges. [401 KAR 50:035, Permits, Section 7 (3)(g)]

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.

Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry. [401 KAR 50:035, Permits, Section 7(2)(b)5]

Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders. [401 KAR 50:035, Permits, Section 8(3)(a)]

Permit Shield: Except as provided in State Regulation 401 KAR 50:035, Permits, compliance by the affected facilities listed herein with the conditions of this permit shall be deemed to be compliance with all applicable requirements identified in this permit as of the date of issuance of this permit.

All previously issued construction and operating permits are hereby subsumed into this permit.

SECTION G (CONTINUED)

(b) Permit Expiration and Reapplication Requirements

This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the division. [401 KAR 50:035, Permits, Section 12]

(c) Permit Revisions

A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of Regulation 401 KAR 50:035, Section 15.

This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority thirty (30) days in advance of the transfer.

Construction, Start-Up, and Initial Compliance Demonstration Requirements

Emission points 003 (PMV40A) and 005 (R04-01), (R05-01), (R06-01), and (R07-01):

Construction of process and/or air pollution control equipment authorized by this permit shall be conducted and completed only in compliance with the conditions of this permit.

Within thirty (30) days following commencement of construction, and within fifteen (15) days following start-up, and attainment of the maximum production rate specified in the permit application, or within fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish to the Division for Air Quality's Frankfort Regional Office in writing, with a copy to the division's Frankfort Central Office, notification of the following:

The date when construction commenced.

The date of start-up of the affected facilities listed in this permit.

The date when the maximum production rate specified in the permit application was achieved.

Pursuant to State Regulation 401 KAR 50:035, Permits, Section 13(1), unless construction is commenced on or before 18 months after the date of issue of this permit, or if construction is commenced and then stopped for any consecutive period of 18 months or more, or if construction is not completed within eighteen (18) months of the scheduled completion date, then the construction and operating authority granted by this permit for those affected facilities

SECTION G (CONTINUED)

for which construction was not completed shall immediately become invalid. Extensions of the time periods specified herein may be granted by the division upon a satisfactory request showing that an extension is justified.

Operation of the affected facilities for which construction is authorized by this permit shall not commence until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055, except as provided in Section I of this permit.

This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance demonstration (test) on the affected facilities in accordance with Regulation 401 KAR 50:055, General compliance requirements. These performance tests must also be conducted in accordance with General Conditions G(IV)6 of this permit and the permittee must furnish to the Division for Air Quality's Frankfort Central Office a written report of the results of such performance test.

Pursuant to Section VII 2.(1) of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:016, Section 1.(1), at least one month prior to the date of the required performance test, the permittee shall complete and return a Compliance Test Protocol (Form DEP 6027) to the division's Frankfort Central Office. Pursuant to 401 KAR 50:045, Section 5, the division shall be notified of the actual test date at least ten (10) days prior to the test.

(e) Acid Rain Program Requirements

If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

(f) Emergency Provisions

An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:

An emergency occurred and the permittee can identify the cause of the emergency;

The permitted facility was at the time being properly operated;

- a. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,
- b. The permittee notified the division as promptly as possible and submitted written notice of the emergency to the division within two working days after the time when emission limitations were exceeded due to the emergency. The notice shall meet the requirements of 401 KAR 50:035, Permits, Section 7(1)(e)2, and include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken. This requirement does

not relieve the source of any other local, state or federal notification requirements.

SECTION G (CONTINUED)

Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement.

In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 50:035, Permits, Section 9(3)]

(g) Risk Management Provisions

The permittee shall comply with all applicable requirements of 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:

RMP Reporting Center
P.O. Box 3346
Merrifield, VA, 22116-3346

If requested, submit additional relevant information by the division or the U.S.

(h) Ozone depleting substances

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.

Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.

Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.

Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.

Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

SECTION H-ALTERNATE OPERATING SCENARIOS NA

SECTION I-COMPLIANCE SCHEDULE NA

SECTION J-DEFINITION OF TERMS

LSM	Low speed mixers
Drop Station from	Refers to a pipe manifold transferring liquid raw material the tank farm to the manufacturing floor.
COM	Continuously operating mill
IPV	Intermediate Process Vessels
HSD	High speed disperser (interchangeable with high shear disperser)